



June 20, 2007

VIA ECFS

Ms. Marlene H. Dortch  
Secretary, Federal Communications Commission  
445 12th Street, SW  
Washington, D.C. 20554

**Re: Notice of Ex Parte Presentation, CS Docket No. 97-80 and CSR-7012-Z**

Dear Ms. Dortch:

On June 19, 2007, the undersigned (John Godfrey, Vice President, Samsung Information Systems America, Inc.) met with Mr. Rudy Brioché (legal adviser to Commissioner Jonathan Adelstein) and with Mr. Andrew Long, Ms. Mary Beth Murphy, Mr. Steven Broeckaert, Mr. Michael Lance, Mr. John Gabrysch, Mr. Sean Carroll, Mr. David Konczal, Mr. Brendan Murray, and Mr. Adam Taylor of the Media Bureau regarding digital cable compatibility with consumer electronics (CE) equipment. On June 20, 2007, I met with Ms. Michelle Carey (legal adviser to Chairman Kevin Martin) and Ms. Christina Chou Pauzé (legal adviser Commissioner Robert McDowell) concerning the same topics.

In all of these meetings, I expressed Samsung's support for the Commission to move quickly to propose rules mandating nationwide standards for attachment of CE products to interactive digital cable services. The furthest-developed such standard, and the only one that is immediately ready to begin being deployed nationwide, is the OpenCable Application Platform ("OCAP"). Samsung has supported OCAP with substantial investments in research and product development, in cooperation with cable operators and other electronics companies.<sup>1</sup> OCAP is designed to enable a cable system's interactive services (*e.g.*, interactive program guide, video on demand, pay-per-view programming) to work with OCAP-equipped navigation devices (*e.g.*, set top boxes, televisions), despite the wide variation among cable head ends and cable-ready navigation devices.

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<sup>1</sup> *For example, see* Press Release, "SAMSUNG, Time Warner Cable And Advance/Newhouse Join Together To Launch OCAP On Interactive HDTV Sets And HD Set-Top Boxes" January 19, 2007.

Because cable operators serve more than two-thirds of U.S. TV households, we believe there will be significant market potential and consumer benefit in retail products with interactive digital cable-ready (“IDCR”) features. After OCAP is deployed nationwide, and with continued development of the technology’s reliability and its compatibility with consumers’ home networks, OCAP can provide the foundation for compatibility between cable systems and retail IDCR devices provided by CE manufacturers. To the extent that additional proposals have been made by both the CE and cable industries in this docket for non-OCAP alternatives to enable CE devices to access cable services, Samsung welcomes the availability of additional choices, provided that OCAP is not delayed. OCAP has already been deployed in a number of cable systems on a trial basis, and OCAP set-top boxes built by Samsung and other companies are ready for wider deployment by cable operators as they provision their systems’ head ends to support OCAP. A timetable for OCAP deployment in cable systems nationwide should be part of any CE-cable compatibility regulatory framework adopted by the Commission.

Regarding conditional access security for CE-cable attachment, I expressed Samsung’s continuing support for the FCC’s July 1, 2007 deadline for cable operators to implement separated security functions in leased set top boxes, which will do much to generate economies of scale and to ensure the smooth and reliable operation of digital cable-ready products. At the same time, I reiterated Samsung’s previously expressed support for the request by Comcast Corp. for a limited waiver from the separated security requirement in low-end digital set top boxes, which would assist cable operators’ digital transition and would still preserve a very substantial degree of common reliance upon the same CableCARD technology in both CE and cable equipment.<sup>2</sup>

I stressed that in the future, as downloadable security technology (*e.g.*, the Downloadable Conditional Access System or DCAS, which Samsung and others are working with cable operators to develop) becomes a viable technical alternative to CableCARD, the Commission should not approve any downloadable system as meeting the separated security requirement unless it is available for CE manufacturers to implement in a standard form, compatible with cable systems nationwide, on reasonable licensing terms. Otherwise, CE manufacturers would be left to use CableCARD technology in CE products while cable set top boxes migrated to one or more proprietary

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<sup>2</sup> See Letter from John Godfrey, Vice President, Samsung Information Systems America, Inc., to Marlene H. Dortch, Secretary, Federal Communications Commission, CS Docket No. 97-80, CSR-7012-Z (September 29, 2006).

Ms. Marlene H. Dortch

June 18, 2007

Page 3

downloadable technologies, undermining the Commission's goals of fostering competition and CE-cable compatibility through the separated security requirement.

This letter is being provided to your office in accordance with Section 1.1206 of the Commission's rules. A copy of this letter is being delivered by e-mail to the party listed below.

Please direct any questions regarding this notice to the undersigned.

Respectfully submitted,

/s/ John M. Godfrey

John M. Godfrey  
Vice President, Government & Public Affairs  
Samsung Information Systems America, Inc.  
1200 New Hampshire Avenue, N.W. #550  
Washington, DC 20036  
phone: (202) 887-5667  
e-mail: john.godfrey@samsung.com

cc:

Michelle Carey

Rudy Brioché

Christina Chou Pauzé

Andrew Long

Mary Beth Murphy

Steven Broeckaert

Michael Lance

John Gabrysch

Sean Carroll

David Konczal

Brendan Murray

Adam Taylor